

GIBSON, DUNN & CRUTCHER LLP

John T. Cox III (Tex. Bar No. 24003722)
Andrew LeGrand (Tex. Bar No. 24070132)
2001 Ross Avenue, Suite 2100
Dallas, Texas 75201-2911
Tel: 214.698.3100
TCox@gibsondunn.com
ALeGrand@gibsondunn.com

Robert Klyman (*pro hac vice*)
333 South Grand Avenue
Los Angeles, CA 90071-3197
Tel: 213.229.7562
RKlyman@gibsondunn.com

Counsel to General Electric International, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE WATTSTOCK, LLC,

Debtor.

WATTSTOCK, LLC,

Plaintiff,

v.

ALTA POWER LLC,

***Defendant, Counter-Plaintiff, and
Third-Party Plaintiff,***

v.

WATTSTOCK, LLC,

Counter-Defendant, and

**GENERAL ELECTRIC
INTERNATIONAL, INC., d/b/a GE
POWER SERVICES,**

Third-Party Defendant.

Case No. 21-31488-sgj11V

**Chapter 11
Subchapter V**

Adv. No. 21-03083-sgj

***Removed from the District Court of
Dallas County, Texas, 116th Judicial
District***

Case No. DC-20-08331

**GENERAL ELECTRIC INTERNATIONAL, INC.'S
DESIGNATION OF RECORD ON APPEAL**

In compliance with Federal Rule of Bankruptcy Procedure 8009(a)(1)(A), General Electric International, Inc. (“GE”) designates the following items to be included in the record on appeal to the U.S. District Court for the Northern District of Texas from the *Order Granting Motion to Remand Action Back to State Court*, dated March 29, 2023 [Docket No. 140]. This designation includes **all exhibits and addenda** attached to or filed with these documents, and all documents incorporated by reference in the designated documents:

Bankruptcy Docket Number	Date¹	Item
141	3/29/2023	General Electric International, Inc.’s Notice of Appeal, <i>and all exhibits and attachments</i>
140	3/29/2023	Order Granting Motion to Remand Action Back to State Court
—	—	Docket Sheet
1	11/9/2021	Notice of Removal, <i>and all attachments</i>
3	12/13/2021	Alta Power LLC’s Motion to Withdraw the Reference
8	1/3/2022	Debtor’s Objection to Alta Power LLC’s Motion to Withdraw the Reference
12	1/5/2022	Statement of Third-Party Defendant General Electric International, Inc. Pursuant to Federal Rule of Bankruptcy Procedure 9027(e)(3)
13	1/5/2022	General Electric International, Inc.’s Response to Alta Power LLC’s Motion to Withdraw the Reference
19	1/7/2022	Report and Recommendation to District Court on Motion to Withdraw the Reference
24	1/24/2022	Statement of Defendant, Counter-Plaintiff and Third-Party Plaintiff, Alta Power LLC Pursuant to Federal Rule of Bankruptcy Procedure 9027(e)(3)
30	2/28/2022	General Electric International, Inc.’s Rule 12(c) Motion for Judgment on the Pleadings, <i>and all exhibits and attachments</i>
31	2/28/2022	General Electric International Inc.’s Brief in Support of 12(c) Motion for Judgment on the Pleadings on Alta Power LLC’s Third-Party Petition, <i>and all exhibits and attachments</i>
32	3/1/2022	Scheduling Order
34	3/3/2022	Stipulated Protective Order, <i>and all exhibits and attachments</i>

¹ Date filed or entered on the Bankruptcy Adversary Docket (No. 21-03083-sgj).

Bankruptcy Docket Number	Date¹	Item
35	3/3/2022	Stipulated Protocol Regarding the Production of Documents and Electronically Stored Information, <i>and all exhibits and attachments</i>
39	3/17/2022	Alta Power's Response to General Electric International Inc.'s Rule 12(c) Motion for Judgment on the Pleadings
45	3/22/2022	Order Accepting Report and Recommendation from the United States Bankruptcy Court Granting Defendant's Motion to Withdraw the Reference
40	3/31/2022	General Electric International, Inc.'s Reply in Support of Its Motion for Judgment on the Pleadings
47	5/12/2022	Order Denying General Electric International, Inc.'s Rule 12(c) Motion for Judgment on the Pleadings
49	7/15/2022	Joint Motion to Modify Scheduling Order, <i>and all exhibits and attachments</i>
50	8/17/2022	Order Granting Joint Motion to Modify Scheduling Order
53	8/29/2022	Transcript of Hearing held May 18, 2022
58	9/29/2022	Agreed Motion to Modify Scheduling Order, <i>and all exhibits and attachments</i>
59	10/5/2022	General Electric International, Inc.'s Motion to Compel Production of Documents from Alta Power LLC, <i>and all exhibits and attachments</i>
62	10/6/2022	Order Granting Agreed Motion to Modify Scheduling Order
65	10/6/2022	Brief in Support of General Electric International, Inc.'s Motion to Compel Production of Documents from Alta Power LLC
66	10/6/2022	General Electric International, Inc.'s Appendix in Support of Motion to Compel Production of Documents from Alta Power LLC
71	10/26/2022	Alta Power LLC's Response in Opposition to General Electric International Inc.'s Motion to Compel, <i>and all exhibits and attachments</i>
72	10/30/2022	Reply in Support of General Electric International, Inc.'s Motion to Compel Production of Documents from Alta Power LLC
75	11/2/2022	Order Granting in Part General Electric International, Inc.'s Motion to Compel Production
96	1/20/2023	Agreed Motion to Dismiss with Prejudice, <i>and all exhibits and attachments</i>
100	1/31/2023	Order Denying GE's Motion to Extend Time to and to Amend the Scheduling Order and Temporarily Stay Discovery and Striking Associated Briefing
101	1/31/2023	Order Granting Agreed Motion to Dismiss with Prejudice

Bankruptcy Docket Number	Date¹	Item
103	2/1/2023	General Electric International, Inc.'s Motion to Withdraw the Reference for All Further Proceedings
104	2/1/2023	General Electric International, Inc.'s Brief in Support of Its Motion to Withdraw the Reference for All Further Proceedings
105	2/1/2023	General Electric International Inc's Appendix in Support of Motion to Withdraw the Reference for All Further Proceedings
106	2/1/2023	Alta Power LLC's Motion to Remand, <i>and all exhibits and attachments</i>
107	2/1/2023	Alta Power LLC's Brief in Support of Motion to Remand
121	2/9/2023	Transcript of Hearing held January 23, 2023
122	2/9/2023	Transcript of Hearing held January 6, 2022
128	2/17/2023	General Electric International, Inc.'s Counterclaim for Declaratory Judgment and Breach of Contract
129	2/22/2023	Alta Power LLC's Response in Opposition to GE's Motion to Withdraw the Reference for All Further Proceedings
130	2/22/2023	General Electric International, Inc.'s Response in Opposition to Alta Power LLC's Motion to Remand
131	2/22/2023	General Electric International, Inc.'s Appendix in Support of Its Response in Opposition to Alta Power LLC's Motion to Remand
132	3/8/2023	Alta Power LLC's Reply in Support of Motion to Remand
133	3/8/2023	Reply in Support of General Electric International, Inc.'s Motion to Withdraw the Reference for All Further Proceedings
134	3/26/2023	Alta Power' Answer and Affirmative Defenses to General Electric International, Inc.'s Counterclaims
137	3/29/2023	Supplemental Brief to Address New Cases Not Briefed by Alta Power but Raised by Alta Power for the First Time at the Hearing on Alta Power's Motion for Remand and GE's Motion to Withdraw the Reference
139	3/29/2023	Alta Power LLC's Response to GE's Supplemental Brief
150	4/5/2023	Transcript of Hearing held March 27, 2023
151	4/10/2023	General Electric International, Inc.'s Motion for Reconsideration of the Court's Order Granting Motion to Remand Action Back to State Court, <i>and all exhibits and attachments</i>
152	4/10/2023	General Electric International, Inc.'s Brief in Support of Its Motion to Reconsider the Court's Order Granting Motion to Remand Action Back to State Court

Dated: April 12, 2023

Respectfully submitted,

/s/ Andrew LeGrand

John T. Cox III (Tex. Bar No. 24003722)
Andrew LeGrand (Tex. Bar No. 24070132)
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
Tel: 214.698.3100
Email: TCox@gibsondunn.com
ALegrand@gibsondunn.com

Robert Klyman (*pro hac vice*)
333 South Grand Avenue
Los Angeles, CA 90071-3197
Tel: 213.229.7562
Email: RKlyman@gibsondunn.com

Counsel to General Electric International, Inc.

CERTIFICATE OF SERVICE

I certify that, on April 12, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the CM/ECF system of the United States Bankruptcy Court for the Northern District of Texas, which will automatically send e-mail notification of such filing to all counsel of record.

/s/ Andrew LeGrand
Andrew LeGrand

Attorney for General Electric International, Inc.